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     FREDERICK JACKSON; A. JACKSON, a Minor; B. JACKSON, a Minor; SHAWNA
 6
     YVETTE MARTIN
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 8
                              UNITED STATES DISTRICT COURT
 9
                            NORTHERN DISTRICT OF CALIFORNIA
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     FREDERICK JACKSON:
                                                        Case No.: C 09-01016 WHA
     A. JACKSON, a Minor;
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     B. JACKSON, a Minor;
     SHAWNA YVETTE MARTIN,
                                                        STIPULATION AND PROPOSED
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                                                        ORDER TO CONTINUE MOTION
                     Plaintiffs.
                                                        FOR SANCTIONS (FRCP 11(b))
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    ٧.
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     CITY OF PITTSBURG; AARON L. BAKER,
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    individually and in his Official Capacity as
    CHIEF OF POLICE OF THE CITY OF
    PITTSBURG POLICE DEPARTMENT;
16
    G. LOMBARDI, individually and as an Officer of
17
    the CITY OF PITTSBURG POLICE
    DEPARTMENT (BADGE #275); C. SMITH,
    individually and as an Officer of the CITY OF
    PITTSBURG POLICE DEPARTMENT (BADGE
19
    #285); P. DUMPA, individually and as an Officer of
    the CITY OF PITTSBURG POLICE
    DEPARTMENT (BADGE #291); WILLIAM
BLAKE HATCHER, individually and as an Officer
of the CITY OF PITTSBURG POLICE
20
21
    DEPARTMENT (BADGE #274); SARA SPIRES.
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    individually and as an Officer of the CITY OF
    PITTSBURG POLICE DEPARTMENT; and
23
    DOES 1 - 100, inclusive.
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                     Defendants.
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          IT IS HEREBY STIPULATED by and between Plaintiffs' attorney, Panos Lagos, Esq. of
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27
    the Law Offices of Panos Lagos and Defendants' attorney, Owen T. Rooney, Esq. of Edrington
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    Schirmer & Murphy, that Plaintiffs' Motion for Sanctions pursuant to FRCP 11(b) shall be heard
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on July 8, 2010. The reasons for such request are as follows:

- 1. Plaintiffs did not provide proper statutory notice of the June 17, 2010 hearing date;
- 2. The parties stipulated to continuing hearing on the motion to July 1, 2010;
- The Court has advised that the Honorable William H. Alsup is unavailable on July 1,
 2010 and that the next available hearing date is July 8, 2010.

It is further stipulated that this Stipulation may be executed in counterpart and the separate signatures treated as one document through incorporation by reference and that any facsimile signatures of counsel on the Stipulation may be treated as the original execution of the Stipulation by that counsel/party.

Dated: June 4, 2010

LAW OFFICES OF PANOS LAGOS

Panos Lagos, Esq. Attorneys for Plaintiffs,

FREDERICK JACKSÓN; et al.

Dated: June 4, 2010

EDRINGTON, SCHIRMER & MURPHY

Owen T. Rooney, Esq. Attorneys for Defendants, CITY OF PITTSBURG; et al.

ORDER

IT IS HEREBY ORDERED that the Motion for Sanctions filed by Plaintiffs shall be

heard on July 8, 2010 at 8:00 a.m. in Courtroom 9, 19th Floor.

June 14, 2010.

HONORABLE WILL U. S. S. IT IS SO ORDERED Judge William Alsup

STIPULATION AND PROPOSED ORDER TO CONTINUE MOTION FOR SANG

C 09-01016 WHA